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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE SCHERING-PLOUGH CORPORATION ERISA LITIGATION	:	Civil Action No. 03-1204 (KSH)(MF)

PLAINTIFF'S NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS AND APPROVAL OF PLAN OF ALLOCATION

PLEASE TAKE NOTICE that on December 14, 2010 at 10:30 am, or as soon thereafter as counsel may be heard, Plaintiff Michele Wendel will move before the Honorable Katherine S. Hayden, U.S.D.J. at the United States District Court for the District of New Jersey, Frank R. Lautenberg U.S. Post Office & Courthouse Bldg., One Federal Square, Newark, N.J., pursuant to Rule 23 of the Federal Rules of Civil Procedure for an order:

1. Granting final approval to the class action settlement in this action on the terms the Class Action Settlement Agreement fully executed as of July 15, 2010 (the "Settlement Agreement") and previously filed with the Court on July 27, 2010, and for certification of the Class as defined in the Settlement Agreement. Attached hereto as Exhibit A is the Order and Final Judgment in the form agreed to by the parties and previously attached to the Settlement Agreement as Exhibit B;

2. Certifying the Class as defined in the Settlement Agreement; and

3. For such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that the grounds for this Motion are set forth in the following papers filed contemporaneously herewith:

A. Memorandum of Law In Support of Plaintiff's Motion for Final Approval of Class Action Settlement, Certification of Settlement Class and Approval of Plan of Allocation (the "Final Approval Memorandum"); and

B. Declaration of Joseph H. Meltzer filed in support of the Final Approval Memorandum, and all exhibits thereto.

Dated: December 6, 2010

Respectfully submitted,

LITE DEPALMA GREENGERG, LLC

s/ Joseph J. DePalma
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CERTIFICATE OF SERVICE

And now, on this 6th day of December, 2010, I hereby certify that the foregoing has been served by electronic means through the Court's transmission facilities on all counsel of record.

Dated: December 6, 2010

LITE DEPALMA GREENGERG, LLC

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